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May 16, 2024

**MEMO ENDORSED**

The Honorable Valerie E. Caproni  
United States District Court Judge for the Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Donte Goulbourne* et al, 23-cr-00544 (S.D.N.Y.)

Dear Judge Caproni:

On behalf of Donte Goulbourne, a defendant in the above-captioned case, we respectfully request permission for him to travel to Jonestown, New York, on May 18, 2024. The reason for his travel is to visit his cousin who is currently incarcerated at Hale Creek Correctional Facility. He will provide his detailed itinerary to his Pretrial Officer. We requested consent from Pretrial Services and the Government. Pretrial Services has no objection to this request, and AUSA Dang stated that "[t]he Government defers to Pretrial."

Thank you for your consideration of this request.

Respectfully Submitted,

Michael J. Gilbert  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Connie Dang, Assistant U.S. Attorney  
Laura Gialanella, U.S. Pretrial Services Officer  
SMRH:4853-7987-3471

Application DENIED. The Clerk of Court is respectfully directed to terminate the open motion at Dkt. 66.

SO ORDERED.

5/17/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE